



PMB TECHNOLOGY BERHAD

REGISTRATION NO. 200201016594 (584257-X)

WHISTLE-BLOWING POLICY

Whistle-Blowing Policy (“The Policy”)

1. PURPOSE

This policy is intended for PMB Technology Berhad (“**PMBT**” or the “**Company**”) and all subsidiary companies within the PMBT Group (the “**Group**”).

All employees of the Group play an important part in maintaining the highest level of corporate ethics within the Group and have a professional responsibility to disclose any known malpractices or wrongdoings (hereinafter referred to as “**Concerns**”).

2. OBJECTIVES

The main objectives of the Policy are to:

- Promote and maintain high transparency, integrity and accountability in the workplace;
- Promote good corporate governance practices in the workplace;
- To provide an avenue for employees and stakeholders to raise their concern in good faith, without fear of reprisal and safeguard such person’s confidentially;
- Protect whistle blower from reprisal as consequence of making a disclosure;
- Provide a transparent and confidential process for dealing with concerns;
- Protect the long-term reputation of the company;
- Support the company’s values;
- Maintain a healthy working culture and an efficient company;
- Ensure that all allegations are thoroughly investigated for appropriate action; and
- Establish new measure or process to prevent the occurrence of the similar situation, where necessary.

3. SCOPE AND SAFEGUARDS

A person or entity making a protected disclosure is commonly referred to as a “Whistle-blower”. Whistle-blowers provide initial information related to a reasonable belief that an improper activity has occurred.

Whistle-blowers are protected against being dismissed or penalised by the Group and the Group will consider mitigating circumstances if the Whistle-blower himself/herself is involved in the activity that he/she reports.

A Whistle-blower’s right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation.

This Policy applies to all Directors and employees of the Group, including full time, part time and contract employees and outside parties such as vendors, clients, contractors and other stakeholders.

This Policy governs the reporting and investigation of improper or illegal activities as well as the protection offered to the whistle-blower who act in good faith.

4. HARASSMENT OR VICTIMISATION

Harassment or victimisation for reporting concerns under this Policy will not be tolerated.

Complete protection will be given to Whistle-blower against any unfair practice not limited to retaliation, threat or intimidation of termination/ suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or including any direct or indirect use of authority to obstruct the Whistle-blower's rights to continue to perform his/her duties including making further disclosure.

The Whistle-blower will be protected under the Whistleblower Protection Act 2010 if he or she makes a disclosure in good faith to an enforcement agency.

5. CONFIDENTIALITY

Every effort will be made to treat the Whistle-blower's identity with appropriate regard for confidentiality. The Group gives the assurance that it will not reveal the identity of the Whistle-blower to any third party not involved in the investigation or prosecution of the matter. The only exception to this assurance relates to an overriding legal obligation to breach confidentiality. The Group is obligated to reveal confidential information relating to a whistle-blowing report, if ordered to do so by a court of law. The Group's assurance of confidentiality can only be completely effective if the Whistle-blower likewise maintains confidentiality.

6. ANONYMOUS ALLEGATIONS

This Policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

7. PROCEDURES

7.1 Procedures for handling the reported allegations

I) Impropriety

This policy covers:

- improprieties or irregularities (including financial and operational);
- suspected fraud or criminal offences;
- breach of confidentiality;
- miscarriage of justice;
- corruption or bribery;
- acceptance of gifts/favour beyond the threshold allowed by the Company;
- breach of Code of Ethics of the Company, including sexual, physical or other abuse of human rights;
- endangerment of an individual's health and safety; and
- failure to comply with legal or regulatory requirements.

II) Reporting

Managers, officers and employees in supervisory roles shall report to the reporting person(s) as stated below on any allegations of suspected improper activities or employment-related concerns, including those relating to financial reporting, unethical or illegal conduct.

The report can be made in the following manner:

- a. verbally; or
- b. E-mail address (*as mentioned below*); or
- c. in writing addressed to and forwarded in a sealed envelope to the following designated person labelling with a legend such as ***“To be opened by the Chief Executive Officer or Chairman of the Audit Committee only.”***

Address: Lot 1797, Jalan Balakong,
Bukit Belimbing,
43300 Seri Kembangan,
Selangor Darul Ehsan.

Email address: whistleblowing@pmbtechnology.com

The Whistle-blower is encourage to disclose his/her name, NRIC number and contact details. The disclosure must at least have details of person(s) involved, nature of allegation, when and where the incident took place as well as supporting evidence, if any.

III) Handling of a reported allegation

The action taken by the Group in response to a report of Concern under this policy will depend on the nature of the Concern. The Chairman of the Audit

Committee (“AC”) shall receive information on each report of Concern and follow-up information on actions taken.

7.2 Investigator

The Internal Auditors shall be the named Investigator unless the Chairman of the AC assigns/appoints another Investigator. Investigator must be impartial and independent of all parties concerned.

The Investigator is required to report all Concerns raised, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the Chairman of the AC.

7.3 Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Group’s Code of Ethics or Code of Conduct or the law and regulations, the results of the investigation shall be reported to the Chairman of the AC in accordance with the applicable procedures for company conduct and the administration of discipline. Any charges of misconduct brought as a result of an investigation under this policy shall comply with established disciplinary procedures.

If an investigation leads to the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the Chairman of the AC. The AC shall bring forward the results of investigation to the Board of Directors (“**Board**”). The Board shall decide on the appropriate next course of action to be taken.

8. DUTIES AND RESPONSIBILITIES OF THE CHAIRMAN OF THE AC

- a) The AC is committed to investigate and address all cases of reported misconduct. The Chairman of the AC shall:
 - Receive and filter complaints;
 - Determine actions to be taken;
 - Assign investigations;
 - Ensure closures and conclusion;
 - Report to the Board for further action; and
 - Report to the relevant authorities, if required.
- b) The Chairman of the AC shall determine the channel for investigation and follow-up action. In order to ensure independence to the inquiry, the Chairman of the AC shall assign the Head of Internal Auditors as the investigator, unless for reasons of conflict of interest, inadequate competence, or enhancing corporate governance, may form an Investigation Committee.

- c) The Investigator shall determine the resources required to complete the investigation within a time set.
- d) The Chairman of the AC shall delegate the authority to the Investigator on unrestricted access to the Group's records and premises, whether owned or rented, without prior knowledge or consent of any person who have custody of any such records when it is within the scope of the investigation.
- e) The Whistle-blower may seek follow-up information about an investigation of a report or any consequent action taken. Subject to legal limitation, the Whistle-blower will be kept informed of the final outcome of the investigation.

9. REPORTING

The written report of the conclusion of all cases shall be properly documented. The report shall be made available upon request by any members of the AC.

10. POLICY MATTERS

This Policy shall be published at the Company's website and shall be displayed prominently at all the Group premises.

11. REVIEW OF THE POLICY

This Policy shall be reviewed periodically by the AC. Revisions, amendments and alterations to this Policy can only be implemented with the approval of the Board.

This policy was reviewed and approved by the Board on 27 May 2022.